

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

THE UNITED STATES OF AMERICA,

Plaintiff,

v.

MATTHEW BALLARD, District Attorney
for the Twelfth Prosecutorial District of
Oklahoma, in his official capacity,

Defendant.

Case No. 4:24-cv-00626-CVE-SH

**UNITED STATES' UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND**

Plaintiff United States of America (“United States”) respectfully moves the Court for an order extending the current deadline of February 12, 2025, for the filing of responses to the Motion of the Cherokee Nation, Chickasaw Nation, and Choctaw Nation of Oklahoma to Intervene as Plaintiffs (ECF No. 24) (“Motion to Intervene”)—as well as the current deadline to file responses to the Muscogee (Creek) Nation’s Motion to Consolidate (ECF No. 42)—to February 21, 2025. In support of this request, the United States asserts:

1. The United States has not requested or received any other extensions of time in this case.
2. Due to the recent change in administration on January 20, 2025, there is new leadership at the Department of Justice and Department of the Interior. Those new agency officials are in the onboarding process and are reviewing this case among many others.
3. To provide new leadership with sufficient time to familiarize themselves with the issues in this case and the pending motions, the United States respectfully seeks this extension, which would apply to all parties.

4. The extension sought will conserve judicial resources and promote the efficient and orderly disposition of this case by ensuring that the United States' responses will reflect the views of the new Department of Justice and Department of the Interior leadership.

5. Counsel for Defendant District Attorney Ballard and counsel for Proposed Intervenor the Cherokee Nation, Chickasaw Nation, and Choctaw Nation of Oklahoma, as well as counsel for the Muscogee (Creek) Nation, have represented that they do not oppose this motion.

6. The requested relief will not affect any other deadlines.

DATED: February 10, 2025

Respectfully submitted,

LISA LYNNE RUSSELL
Deputy Assistant Attorney General

/s/ Cody McBride

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Attorneys for Plaintiff United States of America

CERTIFICATE OF SERVICE

I certify that on February 10, 2025, I electronically filed this document with the Clerk of the Court by using the CM/ECF system, which will serve and send a notice of electronic filing to all parties or their counsel of record.

DATED: February 10, 2025

/s/ Cody McBride
CODY MCBRIDE